

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**JOSHUA PAIR and WILLIAM
GARNER, individually and on behalf of
all others similarly situated,,**

Plaintiffs,

v.

**POSTAL FLEET SERVICES, INC.,
THE STAGELINE COMPANY,
VILANO EMPLOYMENT SERVICES,
INC., LESLIE DORRIS and BRENDA
DORRIS,**

Defendants.

Case No. CIV-21-00759-C

JOINT MOTION TO STAY ALL DEADLINES AND PROCEEDINGS

Plaintiffs Joshua Pair and William Garner (collectively “Plaintiffs”) along with Defendants, Postal Fleet Services, Inc. (“PFS”), The Stageline Company (“Stageline”), Vilano Employment Services, Inc. (“Vilano”), Leslie Dorris, and Brenda Dorris (collectively “Defendants”), by and through their undersigned counsel, hereby submit this Joint Motion to Stay all Deadlines and Proceedings, and as grounds therefore states:

1. There are two (2) related FLSA collective actions pending in federal court, in the Middle District of Florida which assert the same FLSA claims against the same Defendants in this case.

2. The parties in the related FLSA collective actions have already sought and been granted a stay through January 10, 2022 in an effort to pursue settlement negotiations.
3. On December 3, 2021, Plaintiffs in this action filed a Motion to Conditionally Certify FLSA Collective Action, to Order Disclosure of Contact Information for Similarly Situated Individuals, and to Approve Notice of Dissemination (“Motion to Conditionally Certify”). [Doc. 19]. Defendants’ response to the Motion to Conditionally Certify is due on December 27, 2021.
4. On December 8, 2021, Defendants in this case filed a Partial Motion to Dismiss Count I of the First Amended Complaint, or in the Alternative, to Stay Count I of the First Amended Complaint for lack of personal jurisdiction and failure to state a claim upon which relief can be granted (“Partial Motion to Dismiss”). [Doc. 22]. Plaintiffs’ response to Defendants’ Partial Motion to Dismiss is due on December 29, 2021.
5. On December 8, 2021, Defendants simultaneously filed a Motion for Enlargement of Time to File Responsive Pleading to the Collective and Class Action First Amended Complaint (“Motion for Enlargement”). [Doc. 23]. In compliance with Rule 12(b), Defendants’ Motion for Enlargement requested that Defendants be allowed to file a responsive pleading to the remaining

causes of action in the First Amended Complaint within fourteen (14) days of the Court's ruling on the Partial Motion to Dismiss.

6. To allow the parties in the related FLSA collective actions to engage in early settlement negotiations, without incurring additional costs of litigation, the parties request that all current deadlines and all future proceedings in this matter be stayed until January 10, 2022.
7. The granting of a Stay will preserve the judicial resources of this Court.

Respectfully submitted this 27th day of December, 2021.

/s/Elaine R. Turner

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